

EXHIBIT 2

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UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

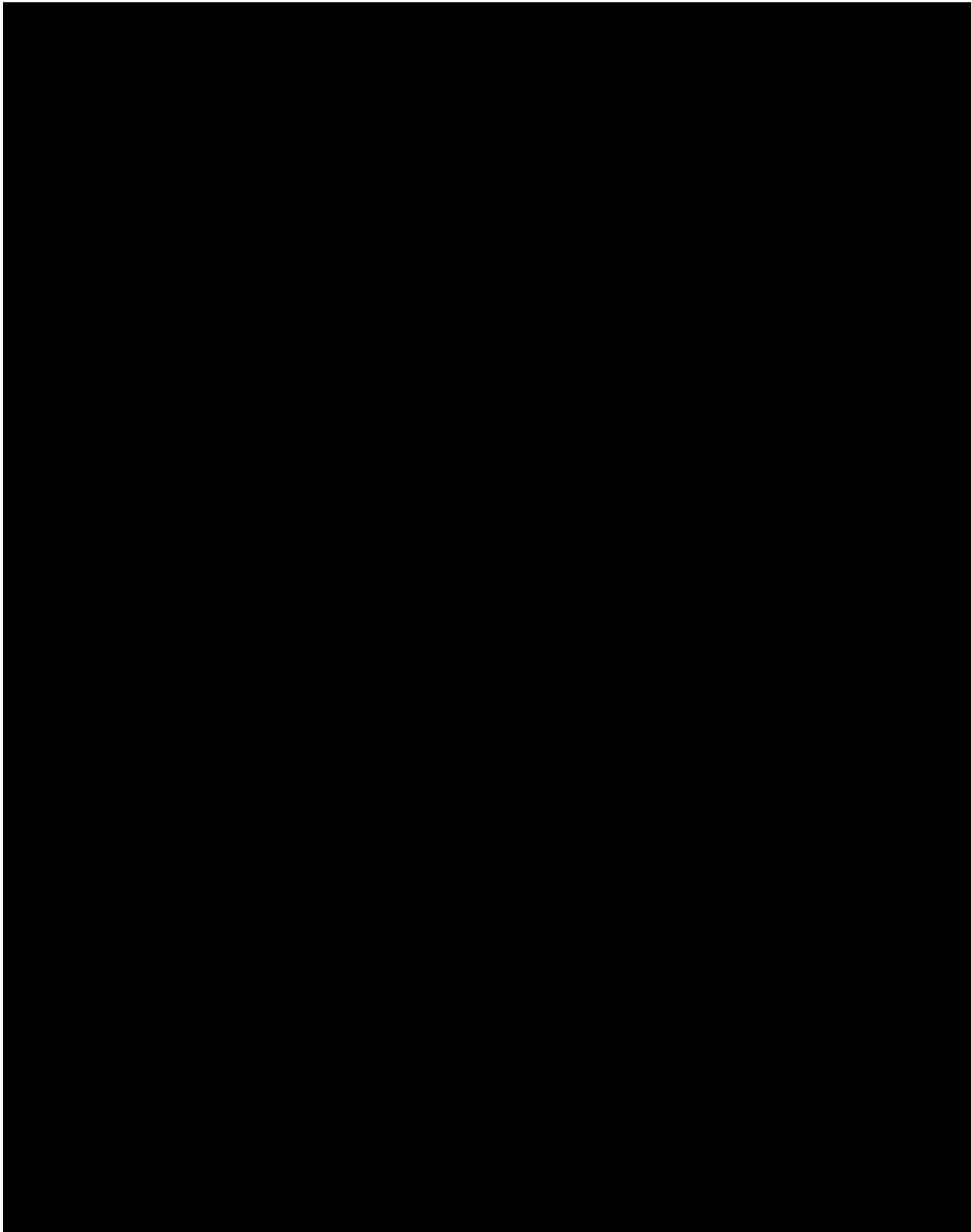
Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S OBJECTIONS
AND RESPONSES TO WAYMO'S
FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS
(NOS. 1-91)**

Trial Date: October 2, 2017

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REQUEST FOR PRODUCTION NO. 28:

All DOCUMENTS and COMMUNICATIONS REGARDING UBER's due diligence of
OTTOMOTTO.

~~HIGHLY CONFIDENTIAL – ATTORNEYS EYES ONLY~~**RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

Defendants have produced documents responsive to this Request in production volumes 19, 26, 27, 28, 29, 32, 33, 37, 40, 41, and 42. Moreover, this Request is the subject of current motion practice, and Defendants cannot produce further requested non-privileged information unless and until the issue is resolved. Defendants are willing to meet and confer with Plaintiff to narrow the scope, subject matter, and time frame of this Request for any further productions.

Defendants object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants have already furnished privilege logs for documents that potentially could be responsive to the Court's March 16, 2017 order. To the extent this Request seeks additional documents, Defendants object that it is overbroad, unduly burdensome, and not proportional to the needs of the case insofar as it seeks "all" documents and communications. Defendants further object to this Request as irrelevant, overbroad, and not proportional to the needs of the case; specifically, Defendants object that the Request is overbroad as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the case to the extent it calls for the production of documents that are unrelated to this litigation.

REQUEST FOR PRODUCTION NO. 29:

All DOCUMENTS and COMMUNICATIONS REGARDING negotiations over UBER's acquisition of OTTOMOTTO.

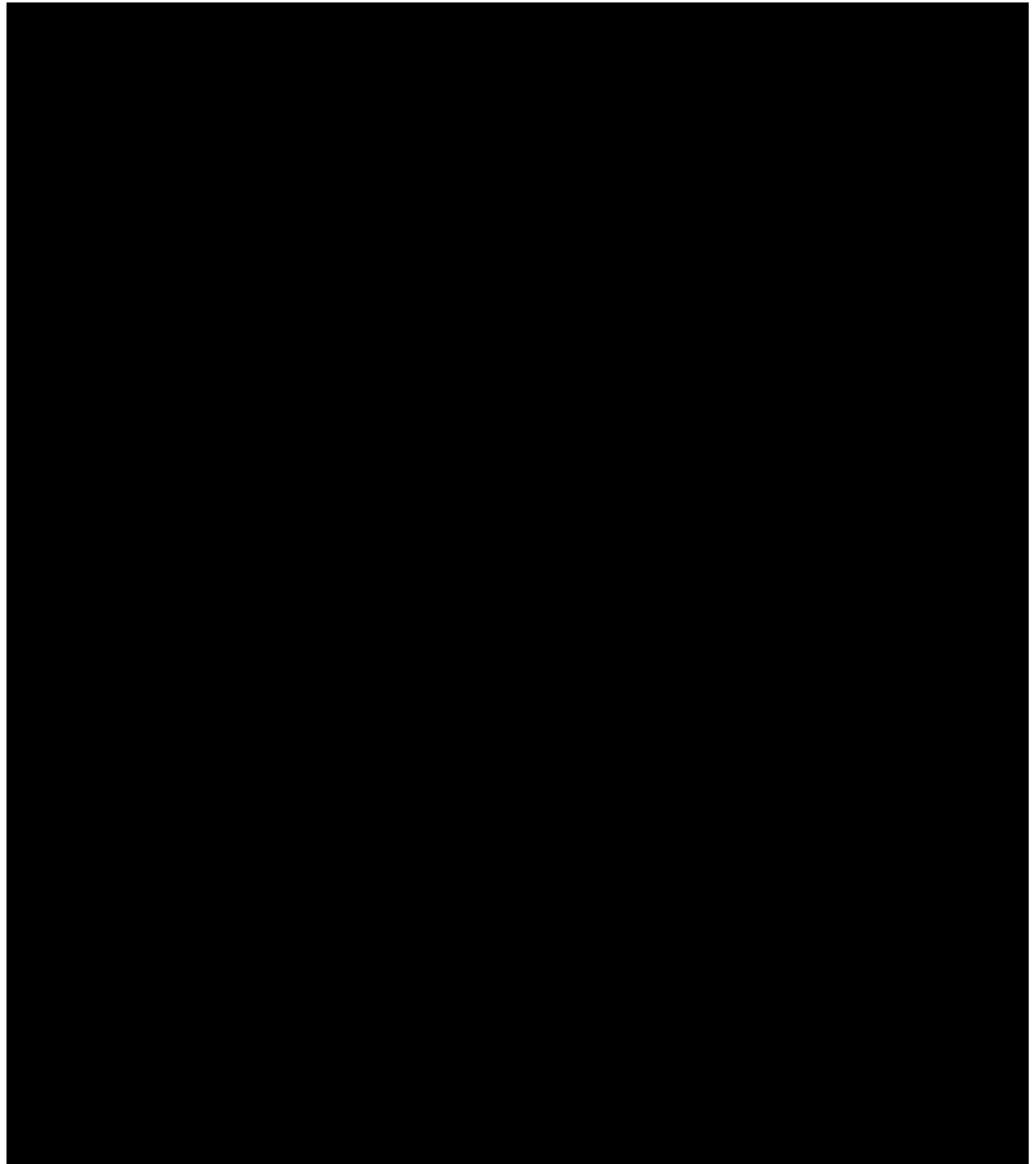
RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Defendants object to this Request to the extent that it seeks information protected by the attorney-client privilege or the work product doctrine or that is otherwise privileged or protected from discovery. Defendants further object to this Request as irrelevant, overbroad, and not proportional to the needs of the case; specifically, Defendants object that the Request is overbroad as to scope, subject matter, and time, and is irrelevant and not proportional to the needs of the case to the extent it calls for the production of documents that are unrelated to this litigation.

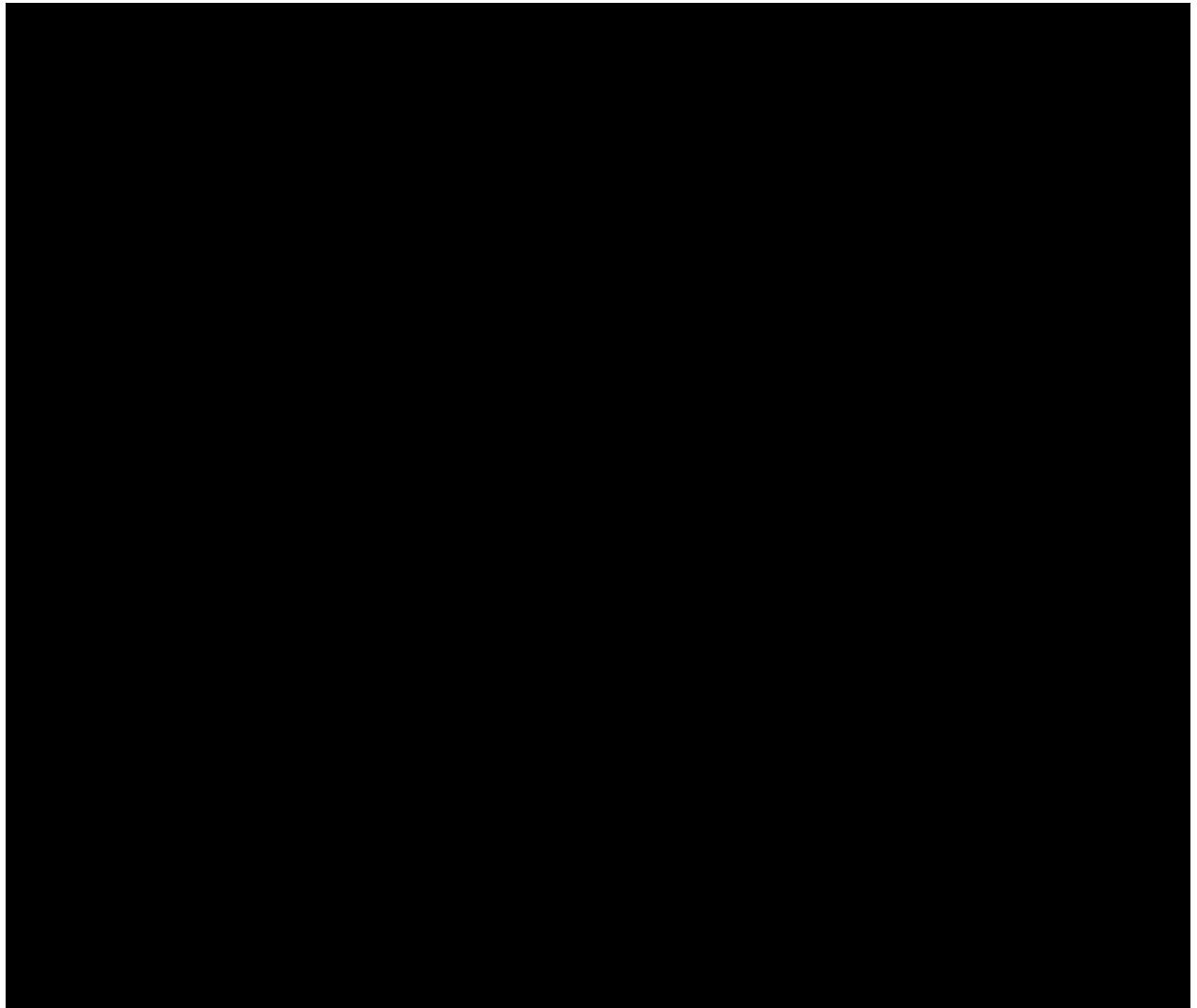
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1 Defendants additionally object that responding to this Request would be oppressive and unduly
2 burdensome.

3 Defendants are willing to meet and confer with Plaintiff to narrow the scope, subject
4 matter, and time frame of this Request.



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Dated: June 23, 2017

MORRISON & FOERSTER LLP

By: /s/ Arturo J. González
ARTURO J. GONZÁLEZ

Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

CERTIFICATE OF SERVICE

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 755 Page Mill Road, Palo Alto, CA 94304. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on June 23, 2017, I served true and correct copies of the following documents:

- **DEFENDANTS UBER TECHNOLOGIES, INC. AND OTTOMOTTO LLC'S OBJECTIONS AND RESPONSES TO WAYMO'S FIRST SET OF REQUESTS FOR PRODUCTION**

☒ **BY ELECTRONIC SERVICE [Fed. Rule Civ. Proc. rule 5(b)]** by electronically mailing a true and correct copy through Morrison & Foerster LLP's electronic mail system to the e-mail address(es) set forth below, or as stated on the attached service list per agreement in accordance with Federal Rules of Civil Procedure rule 5(b).

Recipient	Email Address:
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11 I declare under penalty of perjury that the foregoing is true and correct. Executed at Palo
12 Alto, California, this 23rd day of June 2017.

13 Ethel Villegas

14 (typed)

15 /s/ Ethel Villegas

16 (signature)